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September 15, 2023

VIA CM-ECF (ELECTRONIC FILING)

Hon. Ronnie Abrams
United States District Court Judge
Thurgood Marshall United States Courthouse
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Allied World Assurance Company (U.S.) Inc. vs. Berkshire Hathaway
Direct Insurance Company*
Civil Action No. 1:23-cv-03801-RA

Dear Judge Abrams:

We represent Defendant, Berkshire Hathaway Direct Insurance Company (“Defendant” or “BHDIC”), in the above-referenced matter. We write jointly with counsel for Plaintiff, Allied World Assurance Company (U.S.), Inc. (“Plaintiff” or “Allied World”) further to the Court’s request for a joint letter addressing certain scheduling issues raised during the Initial Conference held on September 1, 2023.

Since the September 1, 2023 Initial Conference, counsel for the parties have met and conferred with each other and with their respective clients. In the course of same, further consideration of settlement-related communications has been conducted and the parties believe it will be fruitful to focus efforts in the coming weeks on seeing if a resolution can be reached. Accordingly, Plaintiff and Defendant respectfully jointly

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request that this action be stayed for approximately four weeks, until October 16, 2023 so that the parties can continue their settlement-related efforts. The parties also propose that an update regarding the status of discussions be provided by October 16, 2023. In the event resolution cannot be reached, as discussed during the Initial Conference, the parties anticipate seeking leave to file motions for summary judgment and, if necessary, will address whether discovery should proceed concurrently in any such requests.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/ Jennifer Mindlin

Jennifer Mindlin, Esq.
Counsel for Plaintiff

Respectfully submitted,

/s/ Jaimie H. Ginzberg

Jaimie H. Ginzberg, Esq.
Counsel for Defendant

Application granted. This action is hereby stayed; the parties shall file a joint status letter no later than October 16, 2023.

cc:
All counsel of record via CM-ECF (electronic filing)

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'Ronnie Abrams', written over a horizontal line.

Hon. Ronnie Abrams
United States District Judge
09/18/2023